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**USAID/MOROCCO INITIAL ENVIRONMENTAL EXAMINATION (IEE)
AMENDMENT # 2 OF IEE ME 12-227**

Title of Program: Enhanced Opportunities for Moroccan Youth

Country/Region: Morocco/ME

Implementing Partner (if designated): International Organization for Migration (IOM)

Funding Begin: o/a January 15, 2017

Funding End: o/a March 31, 2019

Revised LOP Amount: \$12,770,000

Date: December 23, 2016

IEE Prepared by: Idriss Touijer

IEE Amendment (Y/N): Y If "Yes," Date of Original IEE: 10/23/2012

ENVIRONMENTAL ACTION RECOMMENDED:

☒ **Request for Categorical Exclusion(s):** activities have no adverse effect (i.e., training, technical assistance; not to include any infrastructure rehabilitation.)

☒ **Negative Determination:** no significant adverse effects expected for activities which are well defined over life of the award.

☐ without conditions (no special mitigation measures needed)

☒ with conditions (mitigation measures specified)

Purpose and Scope of the IEE Amendment # 2:

The purpose of this amendment is to:

- i. Increase the award TEC from \$8,770,000 to \$12,770,000
- ii. Extend the period of performance end date to March 31, 2019
- iii. Expand the award scope to replicate the FORSATY model in additional cities in Morocco.

All other information in the original IEE remains unchanged.

APPROVAL OF ENVIRONMENTAL ACTION RECOMMENDED:

CLEARANCE:
Mission Director:

Dana Mansuri

Date: 1/9/2017

CONCURRENCE:
Bureau Environmental
Officer:

John Wilson

Date: 1/9/2017

Filename: _____ (USAID/ME BEO)
CC: Project Files, MEO tracking and OAA


ADDITIONAL CLEARANCES:

Mission Environmental Officer:


Fatine Bellamine

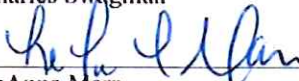
Date: 1/3/17

Team Leader:


Charles Swagman

Date: 1-3-17

Program Officer:


LeAnna Marr

Date: 1-3-17

Regional Environmental Advisor:

By e-mail
Alexandra Hadzi-Vidanovic

Date: 1/6/2017

ADDITIONAL CLEARANCES:

Mission Environmental Officer:

Fatine Bellamine Date: _____


Team Leader:

Charles Swagman Date: _____

Program Officer:

LeAnna Marr Date: _____

Regional Environmental Advisor:


Alexandra Hadzi-Vrdanovic Date: Jan 2017

INITIAL ENVIRONMENTAL EXAMINATION

SUMMARY OF FINDINGS

This face sheet to the Initial Environmental Examination (IEE) amendment summarizes the IEE determinations and provides for mandatory clearances. The IEE that accompanies this face sheet specifies a set of steps to ensure adequate environmental review and provides guidance for mitigation of USAID-supported activities when relevant.

This USAID/Morocco IEE ME 12-227 for the FY 2013-2014 Cooperative Agreement with IOM for the Enhanced Opportunities for Moroccan Youth Program is an Umbrella IEE. The Umbrella IEE permits projects with (1) a large number of activities that are (2) not yet well-defined to be implemented in an expeditious manner while maintaining compliance with Reg. 216.

The USAID/Morocco implementing partner will continue to report on compliance regarding environmental mitigation and monitoring (section 4.2 of the IEE) to USAID/Morocco as part of its reporting requirements.

Key Mitigation, Monitoring, and Evaluation Conditions to the IEE:

- I. Implementation of environmental screening and review procedures for sub-grants of those activities not addressed in this IEE through use of an Environmental Screening Form and Review process in accordance with 22 CFR 216.
- II. Capacity for environmental review.
- III. Adherence to environmentally sound design and management principles in sub-grant activities.
- IV. Appropriate environmental mitigation and monitoring for sub-grant activities.
- V. Adherence to Moroccan environmental laws and regulations.
- VI. Adherence to USAID pesticide procedures, i.e., no pesticides used without USAID approval.

Activity Classifications:

A **Categorical Exclusion (CE)** from environmental examination is recommended for activities under *Enhanced Youth Opportunities Program* pursuant to 22 CFR 216.2(c)2 (i) for activities involving education, technical assistance, or training programs except to the extent such programs include activities directly affecting the environment, 22 CFR 216.2(c)(2)(xiv), for studies, projects or programs intended to develop the capability of recipient countries and organizations to engage in development planning except to the extent that such programs include activities directly affecting the environment (i.e., construction of facilities).

A **Negative Determination with Conditions (NDC)** is recommended for technical assistance or sub-grants involving activities such as *micro and small enterprise support, refurbishing or renovation of facilities and/or spaces (schools, clinics, government buildings, parks, etc.)*, pursuant to 22 CFR 216.3(a)(2)(iii).

This IEE amendment does not cover any activities that would incur a **Positive Determination (PD)**, pursuant to 22 CFR 216.2(d)(1). Nor does this IEE amendment cover procurement, use, transport, storage or disposal of pesticides or other toxic materials, which would require an amended IEE, pursuant to 22 CFR 216.3(b), USAID's Pesticide Procedures.

1.0 Background and Program Description

1.1 Background

This umbrella Initial Environmental Examination (IEE) amendment pertains to all activities carried out under the original USAID/Morocco *Enhanced Opportunities for Moroccan Youth Program* and its revised scope. Given that the Implementing Partner, IOM, must be able to be flexible to award sub-grants to local NGOs in support of the achievement of the *Enhanced Opportunities for Moroccan Youth* program objectives, the sub-grant activities for this program are not well-defined in advance since they are designed to respond directly to the rapidly evolving situation on the ground.

1.2 Program Description

The *Enhanced Opportunities for Moroccan Youth Program* - henceforth referred to as the Favorable Opportunities to Reinforce Self-Advancement of Today's Youth activity (FORSATY) - responds to the challenge of youth marginalization and disaffection in Morocco in selected neighborhoods of Tangier and Tétouan.

The Program addresses the challenges of marginalized youth by building on the capacity of relevant local and national partners by enhancing their ability to identify and work with at-risk youth and young offenders. The Program recognizes that young people, who have not completed a full course of study and cannot find work, constitute a particularly vulnerable group at risk of getting into conflict with the law and possibly being recruited by extremist circles. The partnering local associations are located in poor neighborhoods with a great lack of adequate public services. The anger created by very poor or quasi-inexistent public services delivery may be due not so much to the lack of services per se, but to how it can be interpreted as a total abandonment of responsibility by the State.

To reach the Program goal of preventing delinquency and reducing recidivism among target youth in selected areas of Tangier and Tétouan, the program consists of three objectives/results and one cross cutting result.

- **Result 1:** Marginalized and disaffected youth, who are out of school, are successfully integrated into society.
- **Result 2:** In school youth receive improved support to increase retention, success and decrease drop out.
- **Result 3:** Youth-Serving Organizations are reinforced to better serve the needs of at-risk youth and young offenders.
- **Cross Cutting Result:** Marginalized and disaffected youth enjoy a safer community environment

Extension and Expansion Rationale

After four years of implementation, the project has reached significant momentum and results that have contributed to USAID/Morocco's CDCS goal, i.e. advancing Morocco's initiatives for peaceful reform. Countering violent extremism is critical in meeting the CDCS goal, especially given that violent extremism can undermine the process of reform and threaten the stability of a crucial U.S. ally. Furthermore, the negative, direct and long-lasting effects of violence and instability on Morocco's economic growth can discredit the proposition that democracy and a more pluralistic and transparent government will help address Morocco's development challenges. Therefore, the continuation and expansion of the USAID FORSATY program is a key component in preventing the proliferation of violent extremist movements.

In order to maintain current implementation momentum and build on successful CVE efforts, USAID seeks to expand FORSATY's model to the cities of Fnideq and Al Hoceima and establish youth councils such as those formed in Tangier and Tetouan. This would contribute directly to the Democracy and Governance Development Objective of increasing civic participation because the youth councils will strengthen prospects for sustained youth engagement and dialogue with power holders, thereby ensuring continuous participation in the governance of their community affairs.

USAID expects to extend the life of the project by eighteen months and increase the ceiling to \$12,770,000. The extension and expansion will target only sites with CVE needs, focus on connecting the institutions that serve youth, build the capacity of these institutions, and enable youth to better advocate for their needs. IOM is currently implementing FORSATY under Cooperative Agreement No. AID-608-A-13-00001, which started on October 1, 2012 and is currently scheduled to be completed on September 30, 2017. Once the modification is processed, the new completion date will be o/a March 31, 2019.

2.0 Country and Environmental Information

Morocco faces environmental challenges common to many developing countries experiencing economic growth: pressure on natural resources and the environment that are the consequence of population growth, urbanization, limited funds available for natural resource management and a nascent legal and regulatory framework for environmental protection. Nevertheless, Morocco has demonstrated a commitment to address its environmental challenges.

Despite this commitment to environmental protection and sustainable development, Morocco still faces major environmental challenges. The quality and quantity of water present challenges for the country, which experiences recurring and severe droughts. Water pollution is a nationwide problem and, in addition to the health risks, creates social, environmental and economic problems. To address water issues, Morocco enacted (in 1995) and is implementing a water law, which is much more detailed and prescriptive than prior water-related measures. The law creates nine river basin agencies to manage water at the local level and regulates water use in an integrated manner. Water quality norms were also established. In addition, air pollution, resulting primarily from fossil fuel emissions, poses health and environmental risks, particularly in and around the industrial centers. Land degradation, caused by a variety of factors including overgrazing, destruction of vegetation and unsustainable farming practices, also is an environmental concern and results in loss of biodiversity as well as soil erosion.

Morocco has only begun to address seriously its environmental challenges and will need to continue to develop its environmental regulatory regime in order meet the many goals that it has set out for. Morocco faces resource constraints in its implementation, but the high-level commitment on the part of the Moroccan Government, including the personal commitment of King Mohammed VI, bodes well for Morocco's environmental future.

3.0 Evaluation of Program Issues with Respect to Environmental Impact Potential

Via the provision of Sub-Grants, the Program aims at strengthening the participant NGOs' existing projects reaching at-risk youth and young offenders, and allows them to improve the quality and expand the delivery of their current projects. Local associations will be approached to present project proposals which will then be reviewed and assessed by IOM. Sub-Grants will enable partnering associations to deliver a comprehensive package of services to young beneficiaries in need.

Micro and Small Enterprise (MSE) Development: It is anticipated that IOM will award sub-grants to NGOs for MSE development. Some of the activities associated with MSE support, e.g. start-up of enterprises, will require training and technical assistance. These activities will not have a direct effect on the environment and are Categorically Excludable from further environmental screening under Regulation 216. However, activities that will increase agricultural activities as a result of increased access to finance may have an impact on the biophysical environment and will therefore fall under the Threshold Determination of Negative Determination with Conditions under Regulation 216. The conditions being that for each of these activities once defined, they will need to be subjected to purpose specific environmental screening using the Environmental Review Form (ESF) for identifying activities that have a direct effect on the environment, and host country sectoral environmental guidelines for recommended measures for minimizing or preventing the occurrence of adverse environmental impacts.

Capacity Building of Youth-Serving Organization: IOM will work to strengthen the capacity of youth-serving organization in Tangier and Tetouan in view of better serving at-risk youth and young offenders. This will be implemented through technical assistance and sub-grants to partner NGOs. In the case that IOM or its sub-grantee will support refurbishing, rehabilitation, or renovation of

buildings, the Implementing Partner will be required to complete the environmental review process for such activities. The ERF should be used to help classify potential impacts into low risk, medium risk and high risk categories so that appropriate mitigation and monitoring measures can be identified for all medium and high risk categories.

Although the nature of some activities to be funded is not well enough known to make an informed decision about their potential environmental impacts, due to the type and extent of activities to be funded, any adverse impacts are expected to be easily mitigated.

4.0 Recommended IEE Determination and Mitigation Actions (Including Monitoring and Evaluation)

4.1 Recommended IEE Determinations

A **Categorical Exclusion** from environmental examination is recommended for activities under FORSATY pursuant to 22 CFR 216.2(c)2 (i) for activities involving education, technical assistance, or training programs except to the extent such programs include activities directly affecting the environment, 22 CFR 216.2(c)(2)(xiv), for studies, projects or programs intended to develop the capability of recipient countries and organizations to engage in development planning except to the extent that such programs include activities directly affecting the environment (i.e., construction of facilities).

A **Negative Determination with Conditions** is recommended for technical assistance or sub-grants involving activities such as *micro and small enterprise support, refurbishing or renovation of facilities and/or spaces (schools, clinics, government buildings, parks, etc.)*, pursuant to 22 CFR 216.3(a)(2)(iii).

This umbrella IEE does not cover any activities that would incur a **Positive Determination** (e.g., a large-scale solid waste management projects), pursuant to 22 CFR 216.2(d)(1). Nor does this umbrella IEE cover procurement, use, transport, storage or disposal of pesticides or other toxic materials, which would require an amended IEE, pursuant to 22 CFR 216.3(b), USAID's Pesticide Procedures.

The following table provides threshold decision recommendations for all the activities originally planned and covered by IEE ME 12-227 for the FORSATY activity.

Activities Recommended for Categorical Exclusion (75% of Program Activities Budget)	
Activity	Budget
Activities to retain youth in school	\$144,000
School Reintegration	\$22,800
Support to NGO Social workers	\$33,600
Health education and sensitization campaigns	\$192,000
Development of recreational activities	\$287,000
Assisting the cycle of professional integration	\$67,200
Vocational training	\$75,000
Employability skills/Life skills	\$100,000
Internships	\$6000
Employment placements	\$6000
Individualized psychosocial support & coaching for CSE minors	\$16,800
Individualized psychosocial support & coaching for young offenders on Probation	\$16,800
Capacity building of INAS (Institute for Social Action)	\$42,000
Capacity building of social workers	\$6000
Capacity Building of the Ministry of Youth and Sports – CSE Tangier	\$25,000
Development of new vocational training modules	\$90,000
Assessment and capacity building of civil society organizations	\$90,000
Capacity building of teachers (Ministry of National Education)	\$11,200

Activities Recommended for a Negative Determination with Conditions (25% of Program Activities Budget)		
Activity	Budget	Conditions
Implementation of "Incubators" for small businesses	\$114,000	a. Preparation and submission of an Environmental Manual b. Preparation and submission of an EMMP c. Preparation and submission of Environmental Due Diligence documentation d. Adherence to environmentally sound design and management principles in sub-grant projects. e. Appropriate environmental mitigation and monitoring for program and sub-grant activities f. Adherence to host country environmental laws and policies. g. Adherence to USAID pesticide procedures, i.e., no pesticides used without USAID approval See Section 4.2
Entrepreneurship training & small business startup grants	\$300,000	a. Preparation and submission of an Environmental Manual b. Preparation and submission of an EMMP c. Preparation and submission of Environmental Due Diligence documentation d. Adherence to environmentally sound design and management principles in sub-grant projects. e. Appropriate environmental mitigation and monitoring for program and sub-grant activities f. Adherence to host country environmental laws and policies. g. Adherence to USAID pesticide procedures, i.e., no pesticides used without USAID approval See Section 4.2

The following table provides threshold decision recommendations for all the activities covered by IEE ME 12-227 Amendment # 1, as approved by the BEO on 7/1/2014.

Illustrative Activities	Expected Threshold Determination
Implemented by Recipient (IOM)	
Capacity building for school officials on preventing dropout	Categorical Exclusion per 22CFR216.2(c)(2)(i)
Teacher training on mentoring and collaborative learning	Categorical Exclusion per 22CFR216.2(c)(2)(i)
Capacity building for school officials and parents on parent-teacher associations	Categorical Exclusion per 22CFR216.2(c)(2)(i) and 22CFR 216.2(c)(2)(xiv)
Capacity building for school officials on youth's non-academic development needs	Categorical Exclusion per 22CFR216.2(c)(2)(i) and 22CFR 216.2(c)(2)(xiv)
CSO self-assessment on capacity building needs	Categorical Exclusion per 22CFR216.2(c)(2)(i) and 22CFR 216.2(c)(2)(xiv)
Regular coaching of weak CSOs in NGO management and youth inclusion	Categorical Exclusion per 22CFR216.2(c)(2)(i) and 22CFR 216.2(c)(2)(xiv)

Training on advocacy (how to identify entry points where youth can affect change), organizing, and communications (messaging, follow-up, relationship management, delivering effective presentations, writing clear handouts, etc).	Categorical Exclusion per 22CFR216.2(c)(2)(i) and 22CFR 216.2(c)(2)(xiv)
Capacity building for CSOs and agencies to deliver market-relevant vocational training	Categorical Exclusion per 22CFR216.2(c)(2)(i) and 22CFR 216.2(c)(2)(xiv)
Capacity building for CSOs and OFPPT on providing career guidance and connecting youth with employers	Categorical Exclusion per 22CFR216.2(c)(2)(i) and 22CFR 216.2(c)(2)(xiv)
Estimated Budget Sub-total	\$2,555,500
Implemented by sub-grantees	
Conferences where youth council members from throughout Morocco can gather for training, sharing lessons learned, presenting on activities, etc.	Categorical Exclusion per 22CFR216.2(c)(2)(i)
CSOs deliver training on coordination to local youth service delivery organizations and agencies	Categorical Exclusion per 22CFR216.2(c)(2)(i)
CSOs deliver quality life skills curriculum to marginalized youth	Categorical Exclusion per 22CFR216.2(c)(2)(i)
Capacity building for school officials on preventing dropout	Categorical Exclusion per 22CFR216.2(c)(2)(i) and 22CFR 216.2(c)(2)(xiv)
Teacher training on mentoring and collaborative learning	Categorical Exclusion per 22CFR216.2(c)(2)(i)
Capacity building for school officials and parents on parent-teacher associations	Categorical Exclusion per 22CFR216.2(c)(2)(i)
Capacity building for school officials on youth's non-academic development needs	Categorical Exclusion per 22CFR216.2(c)(2)(i)
CSO self-assessment on capacity building needs	Categorical Exclusion per 22CFR216.2(c)(2)(i) and 22CFR 216.2(c)(2)(xiv)
Regular coaching of weak CSOs in NGO management and youth inclusion	Categorical Exclusion per 22CFR216.2(c)(2)(i) and 22CFR 216.2(c)(2)(xiv)
Training on advocacy (how to identify entry points where youth can affect change), organizing, and communications (messaging, follow-up, relationship management, delivering effective presentations, writing clear handouts, etc).	Categorical Exclusion per 22CFR216.2(c)(2)(i) and 22CFR 216.2(c)(2)(xiv)
Estimated Sub-grantees Budget Sub-total	\$2,714,500
Total Cost Extension Budget Estimate	\$5,270,000

Additional Activities

The following table provides threshold decision recommendations for all the additional activities planned under the additional scope of the award and subject of this IEE Amendment:

Illustrative Activities	Expected Threshold Determination
Implemented by Recipient (IOM)	
Capacity building for school officials on preventing dropout	Categorical Exclusion per 22CFR216.2(c)(2)(i)
Teacher training on mentoring and collaborative learning	Categorical Exclusion per 22CFR216.2(c)(2)(i)
Capacity building for school officials and parents on parent-teacher associations	Categorical Exclusion per 22CFR216.2(c)(2)(i) and 22CFR 216.2(c)(2)(xiv)
Capacity building for school officials on youth's non-academic development needs	Categorical Exclusion per 22CFR216.2(c)(2)(i) and 22CFR 216.2(c)(2)(xiv)
CSO self-assessment on capacity building needs	Categorical Exclusion per 22CFR216.2(c)(2)(i) and 22CFR 216.2(c)(2)(xiv)
Regular coaching of weak CSOs in NGO management and youth inclusion	Categorical Exclusion per 22CFR216.2(c)(2)(i) and 22CFR 216.2(c)(2)(xiv)
Training on advocacy (how to identify entry points where youth can affect change), organizing, and communications (messaging, follow-up, relationship management, delivering effective presentations, writing clear handouts, etc).	Categorical Exclusion per 22CFR216.2(c)(2)(i) and 22CFR 216.2(c)(2)(xiv)
Capacity building for CSOs and agencies to deliver market-relevant vocational training	Categorical Exclusion per 22CFR216.2(c)(2)(i) and 22CFR 216.2(c)(2)(xiv)
Capacity building for CSOs and OFPPT on providing career guidance and connecting youth with employers	Categorical Exclusion per 22CFR216.2(c)(2)(i) and 22CFR 216.2(c)(2)(xiv)
Estimated Budget Sub-total	\$1,754,000
Implemented by sub-grantees	
Conferences where youth council members from throughout Morocco can gather for training, sharing lessons learned, presenting on activities, etc.	Categorical Exclusion per 22CFR216.2(c)(2)(i)
CSOs deliver training on coordination to local youth service delivery organizations and agencies	Categorical Exclusion per 22CFR216.2(c)(2)(i)
CSOs deliver quality life skills curriculum to marginalized youth	Categorical Exclusion per 22CFR216.2(c)(2)(i)
Capacity building for school officials on preventing dropout	Categorical Exclusion per 22CFR216.2(c)(2)(i) and 22CFR 216.2(c)(2)(xiv)
Teacher training on mentoring and collaborative learning	Categorical Exclusion per 22CFR216.2(c)(2)(i)
Capacity building for school officials and parents on parent-teacher associations	Categorical Exclusion per 22CFR216.2(c)(2)(i)
Capacity building for school officials on youth's non-academic development needs	Categorical Exclusion per 22CFR216.2(c)(2)(i)
CSO self-assessment on capacity building needs	Categorical Exclusion per 22CFR216.2(c)(2)(i) and 22CFR 216.2(c)(2)(xiv)
Regular coaching of weak CSOs in NGO management and youth inclusion	Categorical Exclusion per 22CFR216.2(c)(2)(i) and 22CFR 216.2(c)(2)(xiv)
Training on advocacy (how to identify entry points where youth can affect change), organizing, and communications (messaging, follow-up, relationship management, delivering effective presentations, writing clear handouts, etc).	Categorical Exclusion per 22CFR216.2(c)(2)(i) and 22CFR 216.2(c)(2)(xiv)
Estimated Sub-grantees Budget Sub-total	\$2,246,000
Total Modification Budget Estimate	\$ 4,000,000

4.2 Mitigation, Monitoring, and Evaluation for Negative Determination with Conditions

4.2.1 Environmental Manual

To ensure that project activities comply with USAID environmental compliance procedures (22 CFR Part 216) the program team shall follow the recommendations of this Initial Environmental Examination (IEE). The recipient is required to prepare and submit an Environmental Manual (EM) as a means to ensure the implementation of required environmental compliance process for the project. The EM will act as a tool for the FORSATY activity to identify project related environmental impacts and provide mitigation and monitoring to help reduce the potential negative environmental impacts of an activity. The Manual will also enhance beneficial impacts and outcomes of the Program and make them environmentally and socially sustainable and acceptable. The EM will also provide an outline of the methodology for ensuring environmental compliance for the Program. This will include a description of:

- Screening process sub-grant activities;
- The process of assigning project determinations;
- The process for completion of the Environmental Due Diligence (EDD) when applicable;
- The process for completion of an Environmental Assessment (EA) and Scoping Study when applicable; and
- How to manage any potential PERSUAP requirements.

With the aid of this manual and the EMMP, the implementing partner will be able to ensure that any planned activities will comply with USAID regulations.

The Environmental Manual should follow the outline below:

Section 1 – Introduction. The section in hand provides the introduction and objectives and goals of the Manual;

Section 2 – Program Description. This section will summarize the components and tasks, which comprise the FORSATY activity. Potential activities will also be indicated;

Section 3 – Compliance Process. Section Three will summarize USAID environmental procedures, the findings of the FORSATY activity IEE and propose methodologies for adoption of the Environmental Due Diligence (EDD), Environmental Assessment (EA) and PERSUAP Process. The methods of monitoring and reporting will also be outlined along with any requirements for additional environmental training.

Section 4 – Framework Environmental Mitigation and Monitoring Plan. This final section will outline how mitigation and monitoring will be applied to project activities.

Annex A – IEE. This annex provides the IEE in full.

Annex B – Determinations. Annex B will provide an outline of all the proposed and potential FORSATY activities and assign them an initial determination decision based on the IEE recommendations. This Annex will be subject to periodic updates as and when new projects are funneled into the project pipeline.

Annex C – References and Guidelines. This Annex provides details of the references and guidelines applicable to projects outlined in Annex A. The aim of this Annex is to provide guidance for the writer of the EDD / EA.

Annex D – Report Templates. Annex D provides a template for the EDD process.

Annex E – Host Country Regulations. This Annex will provide a description of the EA regulations of Morocco and also an outline of any other relevant environmental regulations or permits to the FORSATY activity.

Annex F – Small Scale Guidelines. This annex quotes directly from the IEE and can be used to develop mitigation measures for small scale construction and operational activities.

Annex G – Main Environmental Problems Nationally and in Target Areas. This section will provide an overview of the general environmental conditions in Morocco and within the target areas. This section of the manual will be continually updated as the program develops across the country

Annex H – Additional Mitigation Measures for FORSATY activities.

4.2.2 Environmental Mitigation and Monitoring Plan (EMMP)

As stated in Mission Order No. 204, environmental management must be an integral part of project implementation. Thus, field implementation of environmental mitigation is the responsibility of the Implementing Partner, with oversight from USAID. The Implementing Partner will report on compliance regarding environmental mitigation and monitoring to USAID/Morocco as part of its regular reporting requirements. The Implementing Partner must provide sufficient evidence of ongoing project monitoring and evaluation to the Agreement Officer Representative. The following requirements must be executed in full by the Implementing Partner to ensure environmental compliance throughout the life of the project:

For certain activities, an EMMP will be prepared. The purpose of the EMMP is to ensure that all impacts identified during the EDD process are adequately mitigated and monitored. If required, the EMMP, will be prepared following the framework EMMP outlined in Annex A. It will include:

- I. **Mitigation measures.** Identify the means taken to avoid, reduce or compensate for impacts.
- II. **Monitoring.** Indicate how mitigation measures will be monitored to ensure that they accomplish their intended result.

As part of the monitoring process, the EMMP will identify who will undertake mitigation and who will conduct the monitoring, and at what frequency. Implementation of an EMMP will also require expenditures, which the Implementer will cover. Where possible and as appropriate, include photos of the site and surroundings; maps; or list the names of any reference materials or individuals consulted.

The Implementing Partner should allocate sufficient technical and financial resources to implement mitigation and monitoring measures. Photographic evidence of activity implementation should be provided in regular reporting.

4.2.3 Environmental Due Diligence (EDD)

The result of an activity classified as a Negative Determination with Conditions will be an EDD. This means that the activities can move ahead if a summary assessment of the activities potential impacts is undertaken. This is called the Environmental Due Diligence process. The EDD is a document that can be between 5 and 15 pages in length. The following provides an outline of the contents of the EDD:

- Project Information
- Description of activities
- Environmental Baseline Conditions
- Evaluation of Activities and Issues with Respect to Environmental Impact Potential.
- Recommended Action of the Activity

The EDD, when completed by the ECS will first be reviewed internally by the Mitigation, Monitoring. The Report will then be sent to USAID MEO for their review and approval. Once the report has been approved, hard copies of the document and its approvals will be kept with the Recipient and USAID/Morocco. If required, the Recipient will undertake monitoring before, during and at the end of the activity. When an activity is completed the Recipient will prepare an activity close out report which will be filed with the EDD. This report may require site-visits and photographs to provide certification that the Activity was completed successfully according to the mitigation and monitoring requirements of the EDD.

No activity classified as a negative determination with conditions can proceed before the MEO has approved the EDD findings. The implementer will also prepare the EDD for Sub-grantee activities if required.

4.2.4 Capacity for Environmental Review

The Implementing Partner must provide adequate evidence that it has sufficient capacity and staff to implement and comply with USAID environmental procedures. It must also demonstrate that it has strong knowledge of environmentally sound project design and implementation principles and

sufficient capacity to complete the environmental screening process and to implement mitigation and monitoring measures.

4.2.5 Adherence to Environmentally Sound Design and Management Principles

The Recipient must certify that it and its partnering organizations will follow environmentally sound project design best practices in developing and implementing activities, and in designing mitigation and monitoring measures. Guidance consulted shall include: USAID's *Environmental Guidelines for Small-Scale Activities in Africa* (2003) (See www.encapafrica.org). These guidelines shall be provided to all Project personnel by IOM.

4.2.6 Adherence to Moroccan Environmental Laws and Regulations

The umbrella IEE acknowledges that the environmental screening and review procedures described in section 4.0 do not substitute for the environmental laws and policies of Morocco. When national laws and policies may impose environmental review requirements on likely program or sub-grant activities, these requirements will be noted and IOM will ensure that these national requirements will be followed.

4.2.7. Adherence to USAID Pesticide Procedures

This umbrella IEE does not cover for pesticide procurement, use, transport, storage or disposal. The Implementing Partner should specifically ensure:

- that none of the funded activities will involve pesticides, OR
- that a separate Pesticide Evaluation Report and Safe-Use Action Plan (PERSUAP) will be prepared and approved pursuant to USAID Regulation 22 CFR 216.3 (b)(1)(i)(a-l).

To ensure that project activities comply with USAID environmental compliance procedures, the Recipient is encouraged to refer to environmental guidelines such as the following:

Environmental Guidelines for Small-Scale Activities (<http://www.encapafrica.org/egssaa.htm>)

IFC EHS Guidelines

(http://www1.ifc.org/wps/wcm/connect/Topics_Ext_Content/IFC_External_Corporate_Site/ifc+sustainability/sustainability+framework/Sustainability+Framework+-+2006/Environmental,+Health,+and+Safety+Guidelines/)

5.0 Summary of Findings/Recommendation

Key mitigation, monitoring, and evaluation conditions to the IEE are:

- h. Preparation and submission of an Environmental Manual
- i. Preparation and submission of an EMMP
- j. Preparation and submission of Environmental Due Diligence documentation
- k. Adherence to environmentally sound design and management principles in sub-grant projects.
- l. Appropriate environmental mitigation and monitoring for program and sub-grant activities
- m. Adherence to host country environmental laws and policies.
- n. Adherence to USAID pesticide procedures, i.e., no pesticides used without USAID approval

Activity Classifications:

A **Categorical Exclusion** from environmental examination is recommended for activities under FORSATY pursuant to 22 CFR 216.2(c)2 (i) for activities involving education, technical assistance, or training programs except to the extent such programs include activities directly affecting the environment, 22 CFR 216.2(c)(2)(xiv), for studies, projects or programs intended to develop the capability of recipient countries and organizations to engage in development planning except to the extent that such programs include activities directly affecting the environment (i.e., construction of facilities).

A **Negative Determination with Conditions** is recommended for technical assistance or sub-grants involving activities such as *micro and small enterprise support, refurbishing or renovation of facilities and/or spaces (schools, clinics, government buildings, parks, etc.)*, pursuant to 22 CFR 216.3(a)(2)(iii).

This IEE does not cover any activities that would incur a **Positive Determination**, pursuant to 22 CFR 216.2(d)(1). Nor does this IEE cover procurement, use, transport, storage or disposal of pesticides or other toxic materials, which would require an amended IEE, pursuant to 22 CFR 216.3(b), USAID's Pesticide Procedures.

Limitations of the IEE:

This assistance doesn't cover activities involving:

1. Assistance for the procurements (includes payment in kind, donations, guarantees of credit) or use (including handling, transport, fuel for transport, storage, mixing, loading, application, clean-up of spray equipment, and disposal) of pesticides (where pesticides cover all insecticides, fungicides, and rodenticides, etc. covered under the "Federal Insecticide, Fungicide, and Rodenticide Act" FIFRA.) or activities involving procurement, transport, use, storage, or disposal of toxic materials, which will require an amended IEE submitted to ME/BEO for approval.
2. Activities involving support to wood processing, agro-processing, industrial enterprises, and regulatory permitting.
3. Assistance, procurement or use of genetically modified organisms (GMOs), will require preparation of biosafety assessment (review) in accordance with ADS 201.3.11.2(b) in an amendment to the IEE reviewed by the Agency Biosafety Review Advisor and approved by REA (or subsequent designee) or the BEO.
4. DCA or GDA programs.
5. Procurement or use of Asbestos Containing Materials (ACM) (i.e. piping, roofing, etc), Polychlorinated Biphenyl's (PCB) or other toxic/hazardous materials prohibited by US EPA and/or under international environmental agreements and conventions, e.g. Stockholm Convention on Persistent Organic Pollutants as provided at: <http://chm.pops.int>.

Any of these actions would require an amendment to the IEE duly approved by the BEO.

Revisions:

Pursuant to 22CFR216.3(a)(9), if new information becomes available which indicates that activities to be funded by the Program might be "major" and the Program's effect "significant," this negative determination will be reviewed and revised by the originator of the project and submitted to the Bureau Environmental Officer for approval and, if appropriate, an environmental assessment will be prepared.

Annex A: Basic EMMP Template

(To use, fill in text in **green highlight**. Delete explanatory comments in **yellow highlight**.)

EMMP for Project **XXX**

Person Responsible for Overseeing EMMP:

[name, contact information]

Budget for EMMP implementation:

Activity 1: [name of activity] [briefly describe activity & summarize potential adverse environmental impacts—from IEE]			
IEE or EA Condition (reproduced from the IEE or EA)	Mitigation Specific actions to be taken to comply with the condition. (if an IEE or EA condition is already specific to the project/ activity and implementation actions self-evident, this "translation step" can be omitted) A single IEE/EA condition may require multiple action to implement—add rows as necessary	Monitoring How will the project verify that the mitigation action is being implemented and is both effective and sufficient?	Timing and Responsible Parties Who is responsible for mitigation, monitoring, reporting? Timing/frequency of these actions

[add rows for additional conditions]

[repeat table for additional activities]